

CHARLES ELMOORE CROPLEY
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IN THE
Supreme Court of the United States

OCTOBER TERM—1942

No.

THE PENNSYLVANIA COMPANY FOR INSURANCE ON LIVES AND GRANTING ANNUITIES, as Executor under the Will of J. Walter Zebley, deceased; THE PENNSYLVANIA COMPANY FOR INSURANCE ON LIVES AND GRANTING ANNUITIES, as Trustee for Madge F. Kurtz, and as Trustee for Wm. B. Kurtz; THE FIDELITY PHILADELPHIA TRUST COMPANY, as Trustee for Florence M. Magill, under the Will of Charles L. McKeehan, deceased; THE FIDELITY PHILADELPHIA TRUST COMPANY, as Executor of the Estate of Anton W. Eichler, deceased; ARLEIGH P. HESS; ALFRED HOEGERLE; GEORGE N. FLEMING; ELMER M. BUCKEY, as Executor of the Estate of Morris F. Miller, deceased; ALBERT J. TAYLOR, as Trustee in Bankruptcy for Kurtz Bros.; HOWARD A. SEAVER; THOS. A. BIDDLE & Co.; GEORGE WOLBERT, as Executor for the Estate of Chas. E. Wolbert, deceased; ROBT. M. WILSON; CHAS. M. JONES; WALTER K. ZERRINGER; CHARLES F. SCHIBENER,

Petitioners,

against

JAMES LEE KAUFFMAN, as Executor of the Estate of William Rhodes Davis, deceased; HENRY W. WILSON; JAMES LEE KAUFFMAN; WILLIAM C. BLIND and DAVIS & COMPANY, INCORPORATED, a Nevada corporation,

Respondents.

**PETITION FOR WRIT OF CERTIORARI TO SUPREME
COURT OF THE STATE OF NEW YORK**

*To the Honorable Harlan Fiske Stone, Chief Justice of
the United States, and the Associate Justices of the
Supreme Court of the United States:*

The petition of The Pennsylvania Company for Insurance on Lives and Granting Annuities, as Executor under the Will of J. Walter Zebley, deceased, et al., respectfully shows:

1. Your petitioners, citizens of the Commonwealth of Pennsylvania, seek review of a final determination of the Court of Appeals of the State of New York dismissing with costs "on the ground that no substantial constitutional question is involved", an appeal from a decision and order of the Appellate Division, First Department, of that State, two Justices dissenting, which affirmed an order and judgment of the Supreme Court, New York County, dismissing the amended complaint of petitioners on the merits before answer under Rule 107, subdivision 5, of the Rules of Civil Practice, on the ground that this cause had been previously determined by a decision and mandate of the Supreme Court of the State of Oklahoma, in a prior action between the same parties.

Jurisdiction

2. This petition for certiorari is made under 28 U. S. C. A., Section 344, subd. (b). The basis of the application is that respondents made a motion in the Supreme Court, New York County, based upon a judgment and mandate of the Supreme Court of Oklahoma, which they contended was a bar to the further prosecution of this action in the New York court; that petitioners herein, plaintiffs in the New York County suit, opposed said motion on the ground that said judgment and mandate of the Supreme Court of Oklahoma were without force and effect because the Supreme Court of Oklahoma was without jurisdiction of the subject matter of said Oklahoma litigation. Also, because the judgment and mandate of the Oklahoma courts was issued without due process of law, contrary to the Fourteenth Amendment to the Constitution of the United States; and specially set up and claimed a right, privilege and immunity under the Constitution of the United States, namely, that said claim of respondents based upon said Oklahoma mandate would deprive petitioners of their property without due process of law, contrary to the Fourteenth Amendment to the Constitution of the United States.

3. Respondents contended in the Supreme Court, New York County, that the mandate of the Supreme Court of Oklahoma was a complete, automatic and conclusive bar to the further prosecution of this action, under Article IV, Section 1, of the Constitution of the United States, commonly known as the "full faith and credit clause". Both parties to said proceeding thereupon specially set up and claimed a right, privilege and immunity under the Constitution of the United States, and each of said parties presented and argued said claims in said Supreme Court, New York County; Appellate Division, First Department, and in the Court of Appeals of New York.

4. Said Supreme Court, New York County, ruled that said judgment and mandate of the Supreme Court of Oklahoma was entitled to full faith and credit in the Courts of New York State and was a bar to the further prosecution of this action. It thereupon held that it was "bound", by the mandate of the Supreme Court of Oklahoma, and dismissed the amended complaint on the merits. Said Supreme Court, New York County, thereby denied the claim of petitioners that the mandate had been entered without jurisdiction and without due process of law, and denied petitioners' right to the examination of the jurisdictional facts relating to those claims and sustained the claim of respondents, that the mandate of the Supreme Court of Oklahoma constituted an automatic bar. Such action of the Supreme Court, New York County, was affirmed by the Appellate Division, First Department, by a three to two decision, and by the Court of Appeals of the State of New York, and said Courts thereby sustained the claim of respondents and denied the claim of petitioners to a right, privilege and immunity under the Constitution of the United States. Petitioners accordingly claim that their property has been taken from them without due process of law, contrary to the Fourteenth Amendment to the Constitution of the United States.

The Opinions of the Courts below

5. The memorandum opinion of the Court of Appeals is reported in 288 N. Y. (Mem.) 149 (288 N. Y. 625). The memorandum opinion of the Appellate Division affirming the order and judgment of the Supreme Court, New York County, together with the dissenting opinion of Mr. Justice Dore, in which Presiding Justice Martin concurred, is reported at 263 App. Div. 939. The opinion of Mr. Justice Leary at Special Term, Part I, of New York County is not officially reported, but is printed in Volume VII at pages 3631-3632 of the Record. Copies of the memorandum opinion of the Court of Appeals; of the memorandum opinion and dissenting opinion in the Appellate Division; of the opinion of Mr. Justice Leary at Special Term, and abstracts of the opinion and dissenting opinion of the Supreme Court of Oklahoma, are attached hereto as Appendix A.

Timeliness of the Petition

6. The Court of Appeals remitted the record to the Supreme Court of New York, New York County, and on June 4, 1942, an order was entered thereon making the determination of the Court of Appeals the judgment of said Supreme Court.

7. Petitioners moved in said Court of Appeals for a reargument, and said motion was denied by order of the Court of Appeals, made June 18, 1942.

8. Thereafter, by order of Honorable Harlan Fiske Stone, Chief Justice of the United States, dated September 17, 1942, the time of petitioners to petition this Court for a writ of certiorari was extended for a period of sixty days from September 18, 1942. This petition is timely.

Questions Involved

9. The precise questions involved are the following:

First: Did the presentation to the New York Courts of the judgment and mandate of the Supreme Court of Oklahoma, foreclose petitioners from opposing the binding effect of said mandate on the ground that it was entered without jurisdiction and without due process of law; and therefore was the effect of the acceptance thereof by the New York Courts, to take the property of petitioners without due process of law, contrary to the Fourteenth Amendment to the Constitution of the United States?

Second: Did the raising by petitioners in the Courts of the State of New York of their right to due process of law under the Fourteenth Amendment to the Constitution of the United States, raise a substantial constitutional question?

Third: Assuming that petitioners are correct in their contention advanced in the New York Courts, that the Oklahoma Courts were without jurisdiction to enter their judgment and mandate, and likewise that said mandate was issued without due process of law, as required by the Fourteenth Amendment to the Constitution of the United States, did the New York Courts err in giving full faith and credit to the mandate of said Supreme Court of Oklahoma, under Article IV, Section 1 of the Constitution of the United States?

Fourth: Did the New York Courts err in refusing to examine the question of jurisdiction by dismissal of petitioners' amended complaint before answer, or on the contrary should the Special Term have permitted the "jurisdictional facts and the application of the rule of *res judicata*" to have been developed at a trial "and not sum-

marily disposed of on a motion before answer", as contended by two dissenting judges of the Appellate Division?

Fifth: The primary question relating to jurisdiction of the Oklahoma Courts may be stated as follows:

Did the *Bowden and Valerius* suit, instituted and prosecuted in the District Court of Tulsa County, Oklahoma, by Davis, a judgment debtor, against his judgment creditors, citizens of the Commonwealth of Pennsylvania, in the form of an alleged representative judgment creditors' action, but in truth and in fact for the sole benefit of the judgment debtor to obtain the satisfaction of the judgment, have a subject matter by virtue of which a court of equity could obtain jurisdiction of said suit?

If not, could jurisdiction be supplied solely by the fact that the suit was instituted and prosecuted in the names of dummies, acting for the judgment debtor, who falsely alleged in their sworn pleadings and proceedings that the suit was instituted and would be prosecuted as a representative action for the benefit of the judgment creditors?

See, *Hansberry v. Lee*, 311 U. S. 32.

Summary and Short Statement of the Matters Involved

10. On January 2, 1929, a judgment for \$169,123.47 was entered in the District Court of Tulsa County, Oklahoma, against William R. Davis, after personal service of the summons. The judgment was in favor of Davis Malcona Company, a Delaware corporation, of which petitioners were preferred stockholders. The corporation subsequently was dissolved leaving the preferred stockholders the owners of the judgment.

11. In 1936 this judgment was unpaid, but in full force and effect. In August of that year, Davis wishing to relieve himself of the judgment, employed one N. E. Bowden to take the necessary steps to obtain the satisfaction of the judgment. Acting under advice of George B. Schwabe, attorney of Tulsa, Oklahoma, Bowden and an associate named Valerius, went to Philadelphia, and with money furnished by Davis purchased 290 shares of preferred stock, out of a total of 1520 shares then outstanding. Previously, Schwabe rendered an opinion letter that this procedure would probably enable Davis to obtain satisfaction of the judgment.

12. Thereafter, on December 14, 1936, Bowden and Valerius, acting for Davis as their undisclosed principal, filed a petition of intervention in the action in which the judgment had been rendered, alleging that said petition was filed on behalf of petitioners and all other owners of the judgment. The petition prayed for appointment of a receiver with power to sell the judgment and that the proceeds of sale be distributed among the parties in interest. Said intervention petition was dismissed on jurisdictional grounds, and immediately thereafter Bowden and Valerius filed a new and independent action in the District Court of Tulsa County praying for the same relief. Said action alleged that it was a representative action instituted and which would be prosecuted for the benefit of the co-owners of the Davis judgment.

13. In the original intervention proceeding a receiver was appointed on *ex parte* application. Thereafter, an affidavit was filed by A. B. Honnold, the attorney who obtained the judgment, stating that in his opinion Bowden and Valerius were acting on behalf of Davis, the judgment debtor.

14. Judge Williams of the District Court, who had appointed the receiver, thereupon heard testimony on this

points, and Bowden, Valerius and Schwabe, their attorney, swore falsely that Davis had no connection with the proceeding, although up to the date of the hearing (February 24, 1937), Davis, or companies which he controlled, had advanced Bowden \$8,886.16 for legal fees and other expenses, and had paid direct to Schwabe \$100 as a fee for his legal opinion on the validity of the judgment and the best means of obtaining its satisfaction.

15. In the plenary suit instituted May 3, 1937, Judge Williams, who heard the testimony in the intervention proceeding, in which it was asserted that Bowden and Valerius were not acting for Davis, appointed a receiver, after stipulating that notice of the appointment should be given to Honnold. In the meantime Bowden had come to terms with Honnold, and on June 17, 1937, signed an agreement with Honnold for the purchase of the judgment for \$15,120. Of this Honnold was to receive \$5,000 as a fee, \$1000 was to go for expenses, and \$9,120 or \$6.00 a share was to be distributed to the preferred stockholders, less \$1,740, or the amount distributable to Bowden and Valerius on the 290 shares previously purchased by them with money supplied by Davis, which it was agreed should be paid to Honnold as additional compensation, making a total of \$6740, to be received by Honnold.

16. This agreement was approved by Davis who caused the sum of \$15,120 to be placed in escrow to be drawn upon when the sale should be confirmed, and a bill of sale issued to his nominee. Honnold thereupon filed an answer, admitting the allegations of the suit, and joined in the prayer that the judgment be sold. Also, he joined in a petition as a result of which an order to show cause why the sale should not be approved was mailed to all of the preferred stockholders. In this and other communications sent to the preferred stockholders it was asserted that the action was brought and would be prosecuted for their benefit. All the petitioners believed that their representa-

tions were true. They learned to the contrary only after the sale of the judgment. (R., Vol. I, pp. 225-226, 227-228, 229-230, 231; Vol. III, pp. 1417-1428; Vol. VI, pp. 3022-3025, 3047-3050; Vol. VII, pp. 3123-3125, 3166-3168, 3179-3182, 3225, 3245, 3309-3310, 3334-3336, 3338-3354, 3356-3395, 3554-3572; Vol. II, pp. 576-627.)

17. In the meantime Davis, who did not completely trust Bowden, required that he execute to Davis five notes for \$50,000 each, all of them fictitious, in order to give Davis a set-off for the approximate amount of the judgment and interest, in the event that Bowden should acquire the judgment and attempt to enforce it. Thereafter, this procedure was reconsidered and Davis caused Bowden to assign his interest in the purchase contract of June 17, 1937 with Honnold, to S. R. Thornburg, a personal friend and business associate of Davis, and to nominate Thornburg as the person to whom the judgment should be sold.

18. The order to show cause why the sale of the judgment should not be confirmed was returnable in the Tulsa Court, September 7, 1937. On that date Schwabe had not been paid the total amount of his fees, and he therefore continued the matter until September 13. The result was that on September 9, 1937, Davis' personal attorney, James Lee Kauffman, went to Tulsa and paid Schwabe \$2,362.00 which with \$2,158.21 previously paid by Bowden from moneys advanced by Davis made a total payment to Schwabe of \$4,520.21 of which \$4,000 represented his fee for services in securing the sale of the Davis judgment, and the balance his expenses. At the same time, Kauffman paid Valerius, co-plaintiff in the suit \$600, for his compensation, for acting as a dummy co-plaintiff for Davis. As stated by the Supreme Court of Oklahoma, Valerius was "only a handy man, who gave his name to the proceedings" (R., Vol. I, fols. 110-113).

19. Schwabe's fees having been paid, on September 13, 1937, he presented to and obtained from Judge Williams an order approving and confirming the sale of the Davis judgment by the receiver to S. R. Thornburg, friend and nominee of Davis. Thornburg thereupon satisfied the judgment. In connection with this order the Court made a journal entry of judgment to the effect that the action was a representative one brought for the benefit of all of the co-owners of the Davis judgment. The record of the subsequent trial showed total payments made by Davis to Bowden, Valerius, Schwabe and others to secure the satisfaction of this judgment, amounted to \$30,418.16.

20. Petitioners in October, 1937, having learned the real nature of the Bowden and Valerius suit, namely, that it was not brought in good faith for their benefit, but in truth and in fact was an action brought by Davis to secure the satisfaction of the judgment for his own account, on October 22, 1937, filed a petition in the District Court of Tulsa County, Oklahoma, praying that the order confirming the sale of the Davis judgment be set aside for fraud. The issues so raised were tried in the District Court of Tulsa County, in May, 1938, before Judge Staley who had succeeded Judge Williams in that Court. The facts above set forth including expenditures by Davis were proven in great detail, and Davis' employment of Bowden and the proceedings to bring about the sale of the judgment were shown beyond dispute. Judge Staley thereupon rendered a judgment setting aside the order of sale on the ground that it had been obtained by "gross fraud" upon the court and upon the co-owners of the Davis judgment. The decision and judgment of Staley, J. contained written findings of fact and conclusions of law, setting forth the major facts referred to above in this petition. From that judgment Davis appealed to the Supreme Court of Oklahoma.

21. The Supreme Court of Oklahoma, two judges sharply dissenting, reversed the judgment of Judge Staley

and reinstated the order of sale. The ground for the reversal, was that no fraud or deceit was practiced on the Court since Judge Williams knew or was on notice by reason of the affidavit filed by Honnold, that Bowden and Valerius were acting for Davis, and that the petitioners herein, as co-owners of the Davis judgment, were not defrauded because no false statements had been made to them. This was predicated on the fact that these petitioners did not sell the judgment but that it was sold by the Receiver, appointed by the Court, allegedly for their benefit and at the Court's direction.

However, the Supreme Court of Oklahoma reversed the decision and judgment of Staley, J., vacating the sale and satisfaction of the judgment for fraud, on the primary ground that Judge Williams could not be deceived as to matters within his knowledge (R., Vol. I, fols. 117-120).

In other words, if Davis, the judgment debtor, brought a fictitious suit in the names of dummies, on the alleged ground that it was a representative action for the benefit of the co-owners of the judgment, and the co-owners were so advised and believed such fact, still their property might be sold for a pittance and they might be deprived thereof because the judge himself knew that the allegations in the pleadings and proceedings were false.

It is to be observed that in a journal entry of judgment, entered simultaneously with the granting of the order of sale, the fact that the suit was a representative cause of action was stated for alleged judisdictional purposes, as follows:

“That this is an action brought by the plaintiffs, as owners of 290 shares of the preferred stock of Davis Malcona Company, formerly a corporation, for the benefit of plaintiffs and all other stockholders of said former corporation, and their successors in interest, and that the Court has jurisdiction of the

subject matter of this action and of the parties hereto, and has heretofore appointed Tom D. Durham of Tulsa, Oklahoma, as receiver in this cause of said judgment heretofore rendered in said cause No. 25845 in this court, and that he ever since has been and still **is the duly appointed, qualified and acting receiver of said judgment, and that said judgment is the sole remaining asset of said Davis Malcona Company, formerly a corporation, which judgment is now owned by the former stockholders of Davis Malcona Company, and their successors in interest, and that the owners of said judgment are entitled to have said judgment collected, sold or otherwise liquidated and the proceeds obtained therefrom partitioned and distributed among such other stockholders of Davis Malcona Company, and their successors in interest, as their respective interests may appear**" (R., Vol. II, p. 620, fols. 1858-1859).

That Judge Williams knew that this recital in the Journal Entry of Judgment was false is given by the Supreme Court of Oklahoma as the express ground of reversing the decision of Staley, J., vacating the sale of the Davis judgment for fraud (R., Vol. I, pp. 38-41).

And this is done in the name of due process of law.

22. In February, 1938, while the above proceedings were pending in Oklahoma, this action was brought in the Supreme Court, New York County against Davis, who was a resident of the State of New York. In the amended complaint filed after the decision of Judge Staley, the first cause of action is against Davis based upon the original judgment of \$169,123.47; the second cause of action is against Davis under the Debtor and Creditor Law of New York for fraudulent concealment and transfer of assets, and the remaining causes of action are to recover damages from the defendants other than Davis, for acts constituting a conspiracy to defraud, incident to the prosecution of the *Bowden and Valerius* suit in the Oklahoma Courts.

23. After the decision of the Supreme Court of Oklahoma reversing the judgment of Judge Staley, respondents above named moved at Special Term under Rule 107, subdivision 5, of Rules of Civil Practice on an exemplified copy of the mandate of the Supreme Court of Oklahoma, to dismiss the amended complaint on the ground that there was an existing final judgment of a court of competent jurisdiction rendered on the merits determining the cause of action between the parties. Respondents, as defendants in the New York action, at that time had not answered owing to an *ex parte* stay of proceedings obtained by respondents from the Supreme Court of Oklahoma. No answer was ever filed (R. Vol. IV, pp. 2117-2134).

24. Petitioners in opposition to the motion put in the whole record of the proceedings in the Oklahoma Courts relating to the sale and satisfaction of the Davis judgment, including the testimony and exhibits in the trial before Judge Staley (R. Vols. II, III, IV, V). Petitioners also expressly contended that the order of the District Court of Tulsa County confirming the sale of the Davis judgment and the mandate of the Supreme Court of Oklahoma reinstating that order, were not entitled to full faith and credit in the courts of New York, for the reason that the order of sale was entered in a proceeding of which the District Court did not have jurisdiction, since it was in fact a suit by a judgment-debtor against his judgment-creditors to obtain the satisfaction of a judgment by means other than payment in full of the amount owed, a proceeding unknown to the law, and that the mandate of the Supreme Court of Oklahoma purporting to reinstate the order did not and could not confer jurisdiction for the purpose of reinstating a void and illegal order of sale (R., Vol. I, pp. 447-453).

25. The Special Term held that it "was bound" by the mandate of the Supreme Court of Oklahoma and thereby granted the motions of respondents and dismissed the

amended complaint. On appeal, the Appellate Division, First Department, affirmed the order and judgment of dismissal, two justices, against three, dissenting on the ground that the issues raised by the affidavits and exhibits of petitioners should be tried, "and not summarily disposed of on a motion before answer" (R. Vol. VII, fol. 10964). The Court of Appeals thereupon dismissed the appeal on the ground "that no substantial constitutional question was involved".

26. Petitioners now seek a review by this court for the following reasons:

The alleged suit brought by Bowden and Valerius for the sale of the Davis judgment was in fact a proceeding by Davis, the judgment-debtor, against his judgment-creditors to bring about the sale of the judgment to himself, for a trifling consideration; that such a proceeding is unknown to the law and no court has jurisdiction in an action by a judgment-debtor, to give relief by appointment of a receiver to sell the judgment so that the judgment-debtor himself can acquire it and obtain its satisfaction; that jurisdiction otherwise lacking is not supplied because the judgment-debtor employed dummies to institute the action who were the agents of the judgment-debtor, but falsely and fraudulently alleged that the suit was instituted and would be prosecuted for the benefit of the co-owners of the judgment, namely, as a representative action for the benefit of the judgment-creditors; that such false allegations did not create jurisdiction where jurisdiction was otherwise lacking. In short, that there is no proceeding known to the law as a "judgment-debtor's suit", and that such lack of jurisdiction was not remedied or supplied by falsely alleging that the suit was a representative *judgment-creditors' suit*. Therefore, that the District Court of Tulsa County, Oklahoma was without jurisdiction of the subject matter of the *Bowden and Valerius* suit, instituted for the benefit of Davis, the judgment-debtor, and at his

expense and the Supreme Court of Oklahoma, equally was without jurisdiction to reinstate a void order of sale or thereby validate or reinstate the satisfaction of the Davis' judgment.

Hansberry v. Lee, 311 U. S. 32;
Western Life Indemnity Co. v. Rupp, 235 U. S.
 261, 273;
Tamly v. Olico, 273 U. S. 510;
United States v. Throckmorton, 98 U. S. 61, 65,
 66.

Therefore that the order of sale of the District Court of Tulsa County and the mandate of the Supreme Court of Oklahoma, purporting to reinstate that order, are null and void and are not entitled to any credit in the courts of a sister state, and that the decisions of the New York courts to the contrary resulted in taking the property of petitioners without due process of law contrary to the Fourteenth Amendment to the Constitution of the United States.

Reasons for Allowance of Writ.

A writ of certiorari should be granted, because:

(1) It is of paramount importance to every litigant in the entire United States, that a doctrine, so contrary to all principles of due process of law, as the doctrine of the opinion and decision of the Supreme Court of Oklahoma in the case at bar, should be authoritatively disaffirmed, which can be done only by this Court.

(2) It is of importance that judgments of the courts of the several states when rendered in proceedings of which they have no jurisdiction should not be given extra-territorial effect by virtue of the full faith and credit clause of the Constitution of the United States.

(3) The decision of the Supreme Court of Oklahoma that a judgment debtor may bring in the names of his agents, a proceeding against his judgment creditors to have a judgment sold or disposed of for his benefit, concealing his own interest in the proceeding, is a holding that courts may be used for the perpetration of fraud, which is a doctrine abhorrant to the law.

(4) The holding of the New York Court of Appeals that it is bound to give full faith and credit to the judgment of the courts of Oklahoma rendered in a proceeding over which those courts did not and could not have jurisdiction is contrary to the decisions of this court and the established law on the application of both the due process of law clause and the full faith and credit clause of the Constitution of the United States.

(5) The effect of the decision of the Courts of Oklahoma in the Bowden and Valerius proceeding and of the courts of New York in the present case has been to deprive your petitioners of their property without due process of law, contrary to the law of the land.

WHEREFORE, your petitioners respectfully pray that a writ of certiorari be issued out of and under the seal of this Honorable Court, directed to the Supreme Court of the State of New York, County of New York, commanding that Court to certify and to send to this Court for its review and determination on a day certain to be therein named, a full and complete transcript of the record and of all proceedings in the case entitled, *Pennsylvania Company for Insurance on Lives and Granting Annuities, as Executor, etc., v. Davis*, and that the determination of the Court of Appeals of the State of New York, and judgment thereon may be reversed by this Honorable Court, and that your petitioners may have such other and further relief in the premises as to this Honorable Court may seem meet and just;

And your petitioners will forever pray.

Dated, November 16, 1942.

Respectfully submitted,

THE PENNSYLVANIA COMPANY FOR INSURANCE
ON LIVES AND GRANTING ANNUITIES, as Ex-
ecutor under the Will of J. Walter Zeb-
ley, Deceased, et al.,

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